

1 Q. Did you refuse to sign it?

2 A. At that time no, sir. I just  
3 wanted to understand it.

4 Q. But you intended to sign it?

5 A. Once I understand what was going  
6 on, because I didn't understand it because I was  
7 on vacation, I just wanted to understand what I  
8 was signing. But after lieutenant explained to  
9 me, I came back and I signed it.

10 Q. So the mustard form that you are  
11 calling it was given to you for not, so-called,  
12 refusing to sign this appraisal form?

13 A. Yes, sir.

14 Q. Any other situations that lead you  
15 to believe that somebody's being biased against  
16 your or, I guess, Chief Gordon is being biased  
17 against you?

18 A. There is other incident, I think  
19 you probably got it in writing. It's the other  
20 incident that we went through, that I can't, you  
21 know, put it into recollection or something like  
22 that. You know I can't remember all of the  
23 letters that I wrote.

1 Q. Let me ask you this: You are  
2 testifying that you believe Chief Gordon has a  
3 problem with you, is that right?

4 A. Yes, sir.

5 Q. Do you believe that Chief Gordon  
6 has a problem with you because you are black or  
7 because of who you are?

8 A. I don't think we never did brought  
9 racial into this. I think we just said he was  
10 biased, but we never did brought race.

11 Q. Did either Chief Gordon or Chief  
12 Walker or anybody else above you in the Fire  
13 Department ever say anything to you in  
14 particular that would lead you to believe that  
15 they have a problem with you based on either  
16 your race, sex, gender, or anything like that?

17 A. Are you asking me for my opinion?

18 Q. No. I'm asking if anybody has  
19 ever said anything to you that made you think  
20 they were prejudiced against you?

21 A. Not that I can recollect.

22 Q. This complaint that you have made  
23 about Chief Gordon's tattoo, have you ever made